

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF TEXAS, DALLAS DIVISION**

JOY ZELIKOVSKY, Individually and on behalf of those similarly situated,	§ § §	
		CIVIL CASE NO. 3:23-CV-02624-N
		§
Plaintiff,	§	
v.	§	
	§	
INTERNATIONAL ASSOCIATION OF EATING DISORDER PROFESSIONALS' FOUNDATION, INC., a California Corporation, BONNIE HARKEN, JOEL JAHRAUS, DENA CABRERA, AND RALPH CARSON	§ § § § § § § § §	
<u>Defendants.</u>	§	

**DEFENDANTS IAEDP'S AND THE BOARD MEMBERS
MOTION TO DISMISS, OR IN THE ALTERNATIVE, TO
TRANSFER TO THE CENTRAL DISTRICT OF ILLINOIS**

Defendants, International Association of Eating Disorder Professionals' Foundation, Inc., ("iaedp"), and Joel Jahraus, Dena Cabrera, and Ralph Carson (collectively, the "Board Members"), by their attorneys, pursuant to Fed.R.Civ.P. 12(b)(2), and/or 12(b)(3), hereby move for dismissal of Plaintiff, Joel Zelikovsky's, Second Amended Complaint for lack of personal jurisdiction and/or improper venue. In the alternative, iaedp and the Board Members request that this case be transferred to the United States District Court for the Central District of Illinois pursuant to 28 U.S.C. § 1406(a) and/or 28 U.S.C. § 1404(a). In support of their motion, iaedp and the Board Members submit herewith a separately filed memorandum of law.

WHEREFORE, Defendants, International Association of Eating Disorder Professionals' Foundation, Inc., Joel Jahraus, Dena Cabrera, and Ralph Carson, respectfully request entry of an

order dismissing all of Plaintiff's claims against them in this litigation for lack of personal jurisdiction and/or improper venue, or in the alternative, entry of an order transferring this case to the United States District Court for the Central District of Illinois.

Respectfully submitted,

/s/ William N. Radford

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Attorneys for Defendants International Association of Eating Disorder Professionals' Foundation, Inc., Joel Jahraus, Dena Cabrera, and Ralph Carson

CERTIFICATE OF SERVICE

I hereby certify that on March 22, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record.

James J. Sipchen

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